

DANIEL G. SWANSON, SBN 116556  
dswanson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

CYNTHIA E. RICHMAN (D.C. Bar No.  
492089; *pro hac vice*)  
crichman@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

JULIAN W. KLEINBRODT, SBN 302085  
jkleinbrodt@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
One Embarcadero Center, Suite 2600  
San Francisco, CA 94111  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

MARK A. PERRY, SBN 212532  
mark.perry@weil.com  
JOSHUA M. WESNESKI (D.C. Bar No.  
1500231; *pro hac vice*)  
joshua.wesneski@weil.com  
WEIL, GOTSHAL & MANGES LLP  
2001 M Street NW, Suite 600  
Washington, DC 20036  
Telephone: 202.682.7000  
Facsimile: 202.857.0940

MORGAN D. MACBRIDE, SBN 301248  
morgan.macbride@weil.com  
WEIL, GOTSHAL & MANGES LLP  
Redwood Shores Pkwy, 4th Floor  
Redwood Shores, CA 94065  
Telephone: 650.802.3044  
Facsimile: 650.802.3100

Attorneys for Defendant APPLE INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

EPIC GAMES, INC.

Plaintiff, Counter-defendant  
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR-TSH

**APPLE INC.'S STATEMENT IN  
RESPONSE TO DISCOVERY ORDER**

The Honorable Thomas S. Hixson

1 As directed by the Court in its discovery order of January 31, 2025, *see* Dkt. 1157, Apple Inc.  
2 (“Apple”) hereby provides the following additional information.

3 With respect to Entry No. 3281 (PRIV-APL-EG\_00104421), the Special Master upheld the  
4 redactions except as to the redaction in the middle of page 31 beginning “Do” and ending with “open.”  
5 It appears that the incorrect line on page 31 was inadvertently redacted, and that the following line  
6 beginning with “Not including” and ending with “issue” should have been redacted instead. The same  
7 line was properly redacted on page 13. In light of the Court’s direction in its prior discovery orders,  
8 Apple will not seek to add redactions and withdraws its objection.

9 With respect to Entry No. 3494 (PRIV-APL-EG\_00106265), Apple agrees that Special Master  
10 Walsh’s clarification does not require objection by Apple or resolution by this Court.

11 Apple is providing to the Court Entry Nos. 2929 (PRIV-APL-EG\_00100996), 2933 (PRIV-APL-  
12 EG\_00101009), 2939 (PRIV-APL-EG\_00101020), and 3221 (PRIV-APL-EG\_00103799) in native  
13 format for *in camera* review.

14  
15  
16  
17 Dated: February 4, 2025

Respectfully submitted,

18 By: Mark A. Perry

19 Mark A. Perry

20 WEIL, GOTSHAL & MANGES LLP

21 Attorney for Apple Inc.  
22  
23  
24  
25  
26  
27  
28